

AKIN LAW GROUP PLLC

45 BROADWAY
SUITE 1420
NEW YORK, NEW YORK 10006
Tel. (212) 825-1400 Fax. (212) 825-1440

ZAFER A. AKIN
LEOPOLD RAIC
ROBERT SALAMAN

GULSAH SENOL
GARIMA VIR

February 28, 2023

Via ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Patricia Cosme v. Goldberg & Associates, P.C. and Julie Goldberg*
Case No. 21-CV-7430 (RA)
Plaintiff's Letter Motion for Extension of Time to File Default Motion

Dear Judge Abrams:

We are counsel to the Plaintiff Patricia Cosme. On February 7, 2023, the Court granted Defendants' counsel's Motion to Withdraw and ordered Plaintiff to move for a default judgment (should she wish) by March 1, 2023.

To Plaintiff's knowledge, Defendants' have not retained new counsel. As such, Plaintiff intends on filing for Default against the Defendants. Plaintiff respectfully requests a brief nine-day extension from March 1, 2023 to March 10, 2023 to file the default motion. I have been out off the office for the last several days with a stomach virus. This is Plaintiff's first and only anticipated request for extension.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Robert D. Salaman

Robert D. Salaman